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18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Terry McRunnel, ) Case No. 2:22-CV-00004-JCM-VCF  
21 Plaintiff, )  
22 vs. ) Joint Stipulation for Extension of Time  
23 ) to Respond to Complaint  
24 )  
25 Aargon, Inc.; Allied Collection Services, ) Current Response Date: Jan. 10, 2022  
26 Inc.; Bank of Hawaii; CAC Financial; ) New Response Date: Jan. 18, 2022  
27 Corelogic; Credco; Factor Trust; Fox )  
Collection Center; Medical Data Systems )  
Inc.; Paragon Revenue Group, Phoenix )  
Financial Services, and Plus Four, Inc., )  
Defendants. )  
)

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Joint Stipulation for Extension of Time

1 It is hereby stipulated by Plaintiff Terry McRunnel and Defendant Phoenix  
2 Financial Services, LLC (“PFS”), through undersigned counsel, that PFS may have  
3 an extension of time to respond to the Complaint from January 10, 2022, through  
4 and until January 18, 2022. This stipulation is made with respect to the following:  
5

6 1. Plaintiff filed this action on November 16, 2021 in the Clark County,  
7 Eighth Judicial District Court.

8 2. Plaintiff served the summons and complaint on PFS on November 22,  
9 2021, making the original response due date December 13, 2021.

10 3. The parties originally agreed to a 21-day extension of time from  
11 December 13, 2021 through January 3, 2022 for PFS to respond to the Complaint.

12 4. On January 3, 2022, this action was removed to the United States  
13 District Court for the District of Nevada making the response due date January 10,  
14 2022.

15 5. Additional time is needed for defense counsel to evaluate the  
16 information necessary to respond to the Complaint. The parties also intend to  
17 discuss potential early resolution of this claim.

18 6. This stipulation is made in good faith and not for any purpose of delay.

19 7. On January 7, 2022, the parties agreed to a short extension of time for  
20 PFS to respond to the Complaint through, and until January 18, 2022.

1 IT IS SO STIPULATED.  
2  
3

Dated: 1/5/2022

KNEPPER & CLARK LLC

4 /s/Miles N. Clark  
5 Miles N. Clark  
6 Attorney for Plaintiff  
7 Terry McRunnel  
8

Dated: 1/5/2022

LINCOLN, GUSTAFSON & CERCOS LLP

9 /s/Shannon G. Splaine  
10 Shannon G. Splaine, Esq.  
11 Attorney for Defendant  
12 Phoenix Financial Services, LLC  
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IT IS SO ORDERED.

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16

17 Cam Ferenbach  
18 United States Magistrate Judge  
19

DATED 1-11-2022